

FILED

2019 FEB 27 AM 10:11

IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

NOEL MOTT,
aka M,
DONALD ADAMS,
aka DON,
FELICIA MCPHERSON,
IVAN TROUP,
aka IVO,
DEVON TROUP,
DESHAWN DOWDELL,
aka BOB,
MARKELL BOYD,
aka DARK,
DENNIS CARTER,
MARCUS CALDWELL,
aka DB, aka BIG MARCUS,
TERRENCE SUDBERRY,
aka B.A.,
ROBERT BOONE,
KRISTOPHER HERRON,
JASON REID,
aka BULL,
WILLIAM NORRIS,
RAYSHAUN WALKER,
aka RAY, aka BLACK,
CYNTHIA HUFFMAN,
aka MOLLY,
TESSA CHRISTY,
aka TESS,
SETH WELLS,
MIRANDA HAMILTON,

INDICTMENT

1:19 CR 99
CASE NO.

Title 18, United States Code,
Sections 2, 922(g)(1), and
924(c)(1)(A); Title 21, United
States Code, Sections 841(a)(1),
(b)(1)(A), (b)(1)(B), (b)(1)(C),
(b)(1)(D), 843(b) and 846

JUDGE NUGENT
JUDGE NUGENT

ASHLIE SMITH,)
MEGAN MORITZ,)
TARYN OHL,)
MYKEL SMITH,)
aka GUNNER,)
Defendants.)

COUNT 1

(Conspiracy to Possess with Intent to Distribute and Distribute Fentanyl, Heroin,
and Oxycodone, 21 U.S.C. § 846)

The Grand Jury charges:

1. From on or about January 1, 2016 to on or about February 28, 2019, the exact dates unknown to the Grand Jury, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants NOEL MOTT, aka M; DONALD ADAMS, aka DON; FELICIA MCPHERSON; IVAN TROUP, aka IVO; DEVON TROUP; DESHAWN DOWDELL, aka BOB; MARKELL BOYD, aka DARK; DENNIS CARTER; MARCUS CALDEWELL aka DB, aka BIG MARCUS; TERRENCE SUDBERRY, aka B.A.; ROBERT BOONE; KRISTOPHER HERRON; JASON REID, aka BULL; WILLIAM NORRIS; RAYSHAUN WALKER, aka RAY, aka BLACK; CYNTHIA HUFFMAN, aka MOLLY; TESSA CHRISTY, aka TESS; SETH WELLS; MIRANDA HAMILTON; ASHLIE SMITH; MEGAN MORITZ; TARYN OHL; and MYKEL SMITH, aka GUNNER did knowingly and intentionally combine, conspire, confederate, and agree together and with each other and with diverse others known and unknown to the Grand Jury, to possess with intent to distribute and to distribute 400 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, 1 kilogram or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of marijuana, a Schedule I controlled substance, in violation of Title 21,

United States Code, Sections 841(a)(1), (b)(1)(A), (b)(1)(C), and (b)(1)(D).

MANNER AND MEANS OF THE CONSPIRACY

2. It was part of the conspiracy that:

A. The co-conspirators obtained heroin, fentanyl, oxycodone, and marijuana from suppliers in Detroit, Michigan, and Mansfield, Ohio, which they redistributed in the areas around Mansfield, Ohio. The co-conspirators concentrated their drug distribution in and around Mansfield, Ohio.

B. NOEL MOTT, SETH WELLS, ROBERT BOONE, MEGAN MORITZ, MIRANDA HAMILTON, and MYKEL SMITH traveled to Detroit, Michigan to obtain large quantities of oxycodone from FELICIA MCPHERSON, DONALD ADAMS, IVAN TROUP, aka IVO, and DEVON TROUP, which was redistributed in the Mansfield, Ohio, area.

C. NOEL MOTT obtained large quantities of heroin and fentanyl from DESHAWN DOWDELL, IVAN TROUP, aka IVO, and J.S. (an individual known to the Grand Jury, but not charged herein) which was redistributed in the Mansfield, Ohio, area.

D. NOEL MOTT and others worked together and distributed fentanyl to other drug traffickers in Mansfield, Ohio, and elsewhere, including KRISTOPHER HERRON; MARKELL BOYD; TERRENCE SADBERRY, aka B.A.; JASON REID, aka BULL; and ASHLIE SMITH.

E. NOEL MOTT and others worked together and distributed heroin to other drug traffickers in Mansfield, Ohio, and elsewhere, including ROBERT BOONE; KRISTOPHER HERRON; MARKELL BOYD; JASON REID, aka BULL; ASHLIE SMITH; DENNIS CARTER; TERRENCE SADBERRY, aka B.A.; RAYSHAUN WALKER; and MYKEL SMITH, aka GUNNER.

F. NOEL MOTT and others worked together and distributed oxycodone to other drug traffickers in Mansfield, Ohio, and elsewhere, including MARKELL BOYD; MARCUS CALDWELL, aka DB, aka BIG MARCUS; TERRENCE SADBERRY, aka B.A.; ROBERT BOONE; KRISTOPHER HERRON; JASON REID, aka BULL; WILLIAM NORRIS; RAYSHAUN WALKER, aka RAY, aka BLACK; CYNTHIA HUFFMAN, aka MOLLY; TESSA CHRISTY, aka TESS; SETH WELLS; MIRANDA HAMILTON; ASHLIE SMITH; MEGAN MORITZ; TARYN OHL; and MYKEL SMITH, aka GUNNER.

G. NOEL MOTT and others worked together and distributed marijuana to other drug traffickers in Mansfield, Ohio, and elsewhere, including MARCUS CALDWELL; TERRENCE SADBERRY; ROBERT BOONE; and RAYSHAUN WALKER.

H. DENNIS CARTER supplied heroin to R.K. and L.J., [individuals known to the Grand Jury, but not charged herein] in Mansfield, Ohio, which they redistributed in the Mansfield area.

I. CYNTHIA HUFFMAN helped coordinate and secure a driver, SETH WELLS, for oxycodone resupply runs to Detroit, Michigan, for NOEL MOTT.

J. The co-conspirators conducted counter-surveillance of law enforcement and shared information with each other about law enforcement presence.

K. The co-conspirators used cellular telephones to make and receive telephone calls and to send and receive text or other electronic messages to conduct their drug trafficking activity. To reduce the risk of being detected by law enforcement, and to conceal the identity of the person using the device, co-conspirators often used cellular telephones that had been obtained in the names of other persons or in fictitious names. It was further part of the conspiracy that the co-conspirators, when using cellular phones or text messaging to conduct drug trafficking activity, used slang terms, street terminology, or code words or phrases to

obscure and to disguise the true nature of their activities and the true meaning of their conversations.

L. NOEL MOTT; MARCUS CALDWELL; ROBERT BOONE; DESHAWN DOWDELL; ASHLIE SMITH; TERRENCE SUDBERRY, and others possessed and used firearms or other weapons to protect their drug trafficking activities.

ACTS IN FURTHERANCE OF THE CONSPIRACY

3. In furtherance thereof, and to effect the goals and conceal the existence of the conspiracy, the defendants and others performed acts in furtherance of the conspiracy in the Northern District of Ohio, Eastern Division, and elsewhere, including, but not limited to the following:

4. On or about February 23, 2016, NOEL MOTT possessed 27.05 grams of marijuana and 17.87 grams of heroin at *** North Main Street, Mansfield, Ohio.

5. On or about March 22, 2018, at approximately 2:37 p.m., R.K. called R.H. [an individual known to the Grand Jury, but not charged herein] on the telephone. During the call, R.H. stated, "Hello." R.K. replied, "Hello." R.H. stated, "Hello, what's up?" R.K. stated, "What's up [R.K.]?" R.H. stated, "Not s**t. What you doin' man?" R.K. stated, "Does DENNIS [DENNIS CARTER] still got that other boy [heroin]?" R.H. stated, "Um, I don't know. I can call him and see." R.K. stated, "Call him real quick for me. Call me back so I can get it." R.H. stated, "Okay." R.K. stated, "Alright." R.H. stated, "Alright."

6. On or about April 27, 2018, at approximately 12:30 p.m., DENNIS CARTER called L.J. on the telephone. During the call, CARTER stated, "Yo, you got um, you got the um, rest of the um, mixture [heroin]?" L.J. stated, "The what?" CARTER stated, "The um, thing that go in the kitchen blender." L.J. stated, "Do I got one?" CARTER stated, "Yeah." L.J. stated,

"Yep." CARTER stated, "I need to use." L.J. stated, "You want to come by, you can come this way. Just come up, pull up over here . . ." CARTER stated, "Okay, alright."

7. On or about April 29, 2018, at approximately 11:31 a.m., DENNIS CARTER called L.J. on the telephone. During the call, L.J. stated, "Yo." CARTER stated, "Yo. Hey, I'm on Poplar, man. Hey, bring that uh, can you bring that. Can you bring that uh, blender with you?" L.J. stated, "Uh, ah. Yeah, I can grab it right quick." CARTER stated, "It's the little small one, right?" L.J. stated, "Uh . . ." CARTER stated, "Not the big, not the big grand mama blender, is it?" L.J. stated, "Uh, where Poplar at first?" CARTER stated, "I'm on Poplar, on uh Glessner. Across the street from the hospital" L.J. stated, "Oh, I mean it's, it ain't a super, super small one. But you know, it gets the job done. How much you tryin' to put in there?" CARTER stated, "Shit. I'm a, um, I'm gonna take care of you [provide you heroin], then I'm, then I'm gonna do my thing." L.J. stated, "I mean it should, it should get the job done. For real." CARTER stated, "Huh?" L.J. stated, "I said it should get the job done." CARTER stated, "Alright, it ain't nothin' but like s**t . . . less than about a buck fifteen [115 grams of heroin] . . ." L.J. stated, "Oh yeah, it should go right in there. We'll get that done, that's cool." CARTER stated, "Alright, bring me some uh, you got some of that what's her name too?" L.J. asked, "What are you talkin' about?" CARTER stated, "The mix." L.J. stated, "Uh, uh." CARTER stated, 'Cause you know I still got, the, the hook up you gave me, I still got that, man. I hadn't did nothin' with that, I ain't even gonna lie." L.J. stated, "See that's why I told you . . . see what I'm sayin'?" CARTER stated, "I know that, but it's just sittin' in Detroit . . . I ain't, I forgot to bring it back, so I can bulk, bulk that up too. But what I got, you know, put . . . on it though." L.J. stated, ". . . brought that mug back." CARTER stated, "No, I, man, ah, that s**t wasn't even, that s**t was garbage. But, uh." L.J. stated, "[inaudible]." CARTER stated, "Huh?" L.J. stated, ". . . Gotcha, gotcha man."

CARTER stated, "Alright, you, you uh, put that together for me and I'm on Poplar, man. ***

Poplar." L.J. stated, "****? I'm about to be on my way right now." CARTER stated, "Alright."

8. On or about May 25, 2018, at approximately 6:09 p.m., DENNIS CARTER sent a text message to NOEL MOTT, which stated, "Man this s**t [heroin] I got is the truth it's to strong and I don't know how to bring it down."

9. On or about May 25, 2018, at approximately 6:59 p.m., DENNIS CARTER sent a text message to NOEL MOTT, which stated, "Can you do something with it [Can you help me cut it?]."

10. On or about May 25, 2018, at approximately 8:22 p.m., NOEL MOTT sent a text message to DENNIS CARTER, which stated, "I need to know what its post to take."

11. On or about May 25, 2018, at approximately 8:23 p.m., DENNIS CARTER sent a text message to NOEL MOTT, which stated, "10."

12. On or about May 25, 2018, at approximately 8:24 p.m., NOEL MOTT sent a text message to DENNIS CARTER, which stated, "What [cut] you put on it."

13. On or about May 25, 2018, at approximately 8:26 p.m., DENNIS CARTER sent a text message to NOEL MOTT, which stated, "Benifiber."

14. On or about May 25, 2018, at approximately 8:27 p.m., DENNIS CARTER sent a text message to NOEL MOTT which stated, "I put a1 on it and it's still a killer [I put cut on it and it's still strong]."

15. On or about June 6, 2018, KRISTOPHER HERRON met a person cooperating with law enforcement [hereinafter referred to as Source 1] at ** Douglas Avenue, Apartment A, Mansfield, Ohio. During the meeting, HERRON sold Source 1 approximately .5 grams of fentanyl for \$45.

16. On or about June 7, 2018, KRISTOPHER HERRON met Source 1 at ** Lind Avenue, Mansfield, Ohio. During the meeting, HERRON sold Source 1 approximately .38 grams of fentanyl for \$50.

17. On or about June 13, 2018, at approximately 6:02 p.m., NOEL MOTT sent a text message to RAYSHAUN WALKER which stated, "What is it looking like [How many oxycodone pills do you have left?]."

18. On or about June 13, 2018, at approximately 6:02 p.m., NOEL MOTT sent a text message to RAYSHAUN WALKER, which stated, "Over there [The drug distribution house]."

19. On or about June 13, 2018, at approximately 6:02 p.m., NOEL MOTT sent a text message to RAYSHAUN WALKER, which stated, "Blue [30 mg Oxycodone pills] and Green [15 mg Oxycodone pills]."

20. On or about June 13, 2018, at approximately 6:32 p.m., RAYSHAUN WALKER sent a text message to NOEL MOTT, which stated, "64 blue [Sixty-four 30 mg Oxycodone pills] 3940 [\$3,940] 9 and half zips [9.5 ounces of marijuana] 1075 [\$1,075]."

21. On or about June 15, 2018, at approximately 3:23 p.m., NOEL MOTT sent a text message to RAYSHAUN WALKER, which stated, "What the blues [30 mg Oxycodone pills] look like meg [MEGAN MORITZ] bout to pick up green money [money for 15 mg Oxycodone pills]."

22. On or about June 15, 2018, at approximately 3:24 p.m., RAYSHAUN WALKER sent a text message to NOEL MOTT, which stated, "Still 190 [190 30 mg Oxycodone pills]."

23. On or about June 16, 2018, at approximately 8:18 a.m., MYKEL SMITH sent a text message to NOEL MOTT, which stated, "any puppy food [heroin] around?"

24. On or about July 9, 2018, at approximately 8:22 a.m., NOEL MOTT sent a text message to MYKEL SMITH, which stated, "I'm good on boi [heroin]."

25. On or about July 9, 2018, at approximately 8:23 a.m., MYKEL SMITH sent a text message to NOEL MOTT which stated, "damn I wish I woulda known that 15 min ago. I was on my lunch break. I'll hit you up."

26. On or about July 31, 2018, at approximately, 9:29 p.m., RAYSHAUN WALKER called NOEL MOTT on the telephone. During the call, WALKER stated, "What's poppin' cuz?" MOTT asked, "What up though?" WALKER stated, "I have some money down here for you." MOTT asked, "It gone?" WALKER stated, "140. No I still got 50 [50 Oxycodone pills] left." MOTT stated, "Alright, I'm about to come down there." WALKER stated, "Alright." MOTT stated, "Alright."

27. On or about August 1, 2018, at approximately 1:24 a.m., CYNTHIA HUFFMAN sent a text message to NOEL MOTT, which stated, "Nothin was seeingi if you had any [Oxycodone pills] or go up the street."

28. On or about August 1, 2018, at approximately 1:26 a.m., NOEL MOTT sent a text message to CYNTHIA HUFFMAN, which stated, "How many u need."

29. On or about August 1, 2018, at approximately 1:26 a.m., CYNTHIA HUFFMAN sent a text message to NOEL MOTT, which stated, "5 [Five Oxycodone pills]."

30. On or about August 1, 2018, at approximately 1:35 a.m., NOEL MOTT sent a text message to CYNTHIA HUFFMAN, which stated, "He down there do u need me to come out."

31. On or about August 1, 2018, at approximately, 6:37 p.m., NOEL MOTT called RAYSHAUN WALKER on the telephone. During the call, WALKER stated, "What up cuz?" MOTT asked, "What up doe? What we lookin' like?" WALKER stated, "We got probably like, like 50-60 [50-60 Oxycodone pills] left." MOTT asked, "50, 60 left?" WALKER stated, "[inaudible]" MOTT stated, "Alright, I'm call you when I'm on the south end. What you got, what you got down at Kez's?" WALKER stated, "Huh?" MOTT asked, "How much you got

down at Kez's?" WALKER stated, "Oh about . . . just a little under three bins [3 containers of marijuana]." MOTT replied, "Alright."

32. On or about August 1, 2018, at approximately, 7:32 p.m., NOEL MOTT called RAYSHAUN WALKER on the telephone. During the call, WALKER stated, "Hello." MOTT stated, "Yeah! You want em' or not?" WALKER stated, "Huh?" MOTT stated, "She drivin' my van down the street. Ah, give ASHLIE [ASHLIE SMITH] 25 [25 Oxycodone pills] more of mine." WALKER stated, "Twenty five?" MOTT stated, "Yeah." WALKER stated, "Alright." MOTT stated, "Alright."

33. On or about August 1, 2018, at approximately 8:26 p.m., NOEL MOTT called DONALD ADAMS on the telephone. During the call, ADAMS stated, "Hey. What's up?" MOTT stated, "Hey, Don." ADAMS stated, "Yup." MOTT stated, "My, my, my people gettin' ready to leave the um, come that way, you know it take three hours. I was wonderin', can I, can they drop some money off there? I'll give you a hundred dollars to hand it off to Lisa in the mornin'?" ADAMS stated, "To hand off to Lisa? Yeah." MOTT stated, "Yeah, alright. So they 'bout to leave now. So it will be three hours before they get to your house." ADAMS stated, "Okay, and um." MOTT stated, "It's 10,000 [\$10,000]. It's gonna be a hundred with it for you." ADAMS stated, "Okay, well d**n, Lisa getting 10,000 for that s**t?" MOTT stated, "It's gonna be tomorrow, yeah she just called me. That's why I was makin' sure I had that money there." ADAMS stated, "Uh, yeah, well hell. . . I got uh, I have two." MOTT stated, "Do you got, do you got some tonight?" ADAMS stated, "Yeah, I ain't got but a 110 [110 Oxycodone pills], 15s [Oxycodone 15mg pills] tonight." MOTT stated, "S**t, I'll pick them up tonight too." ADAMS stated, "Okay, and I have uh, I have uh, 175 [175 Oxycodone pills] tomorrow." MOTT stated, "Alright, alright. So when I come down there to, I'll get them when I come down to pick up the thing. I'll pay you for them." ADAMS stated, "Okay." MOTT stated, "Alright, um, you said you

got a 175, 50? How many?" ADAMS stated, "No just 110 [110 Oxycodone pills] of 15 [Oxycodone 15 mg pills]." MOTT stated, "60, 15s [Oxycodone 15 mg pills], 60, 30s [Oxycodone 30 mg pills], alright." ADAMS stated, "Yeah." MOTT stated, "Times, times what? 21, 22 what? 22 [\$22 per pill]?" ADAMS stated, "Uh, yeah 22, yeah." MOTT stated, "Alright, alright, alright. They will see you shortly."

34. On or about August 1, 2018, at approximately 10:07 p.m., CYNTHIA HUFFMAN called NOEL MOTT on the telephone. During the call, HUFFMAN stated, "What do you want me to get?" MOTT stated, "Let me speak to him." HUFFMAN stated, "Alright, I'm waitin' on him. I thought he was at the door already. He's lookin' out the window now. Hold on, here he is." An Unknown Male stated, "Oh, hello?" MOTT stated, "Hey, give her a blue [one Oxycodone pill] and ten dollars for me, bro." The Unknown Male stated, "Alright." MOTT replied, "Alright."

35. On or about August 2, 2018, at approximately 7:27 p.m., WILLIAM NORRIS sent a text message to NOEL MOTT, which stated, "Boss u got more blues [Oxycodone pills]."

36. On or about August 2, 2018, at approximately 7:32 p.m., NOEL MOTT called DONALD ADAMS on the telephone. During the call, ADAMS stated, "Hello." MOTT stated, "Hey Don? Did." ADAMS stated, "[inaudible]." MOTT stated, "Did your come in today?" ADAMS stated, "Ah yeah, I, I, I put with yours cause Lisa was short." MOTT stated, "Alright, ah, how much ah, money was left over?" ADAMS stated, "Ah, I didn't even count it though. Dale and them still hanging, so I didn't even count it." MOTT asked, "How many did you get?" ADAMS stated, "It was one, what's that on, one seventy nine [179 Oxycodone pills]?" MOTT stated, "One seventy nine and her 209 [209 Oxycodone pills]?" ADAMS stated, "And her 209, yeah." MOTT stated, "Alright, alright, alright, um, 179 and 209. I'm gonna do some math and call you back." ADAMS stated, "Okay and ah, I should have one coming in. Let me see

tomorrow, or nah, it will be Friday because she go to the doctor and she go to the . . . place until one or two o'clock in the morning. That's when the girl take care of her." MOTT stated, "Okay, alright, I'll call you back." ADAMS stated, "Okay, well, you know I'm stayin' at the house because I don't want to be that far out of pocket." MOTT stated, "Alright." ADAMS stated, "So. Yep, alright then." MOTT stated, "Alright."

37. On or about August 2, 2018, at approximately 7:52 p.m., NOEL MOTT sent a text message to WILLIAM NORRIS, which stated, "Omw to the south with them."

38. On or about August 2, 2018, at approximately 8:10 p.m., WILLIAM NORRIS sent a text message to NOEL MOTT, which stated, "Ok I'm here waiting."

39. On or about August 2, 2018, at approximately, 9:44 p.m., NOEL MOTT called WILLIAM NORRIS on the telephone. During the call, NORRIS stated, "Yes sir." MOTT stated, "Hey, we can't find your money Bill, how much money you thought you put on the table?" NORRIS stated, "1800 [\$1,800]." MOTT stated, "There's nowhere near 1800 [\$1,800]." NORRIS stated, "Yes it was, it was 50 uh, 50, 20s [fifty \$20 bills] and then there was, uh, 500 [\$500] and, uh, 100s and 50s and another 300 [\$300] that I just put in there at Tony's." MOTT stated, "Oh, I got none of that. I just got the 900 [\$900] and I only got the 50, 20s." NORRIS stated, "No, I put both stacks there, bub. I set it right in front of you and . . . right in front of you twice." MOTT stated, ". . . got the money now. I'm about to call back there."

40. On or about August 3, 2018, at approximately 10:41 p.m., CYNTHIA HUFFMAN called NOEL MOTT on the telephone. During the call, HUFFMAN stated, "How long before you got them things [Oxycodone pills] over here?" MOTT stated, "I'm on Adams now!" HUFFMAN stated, "Alright." MOTT stated, "I'm on *** [*** South Adams Street, Mansfield, Ohio] though" HUFFMAN stated, "Alright."

41. On or about August 5, 2018, at approximately 4:55 p.m., CYNTHIA HUFFMAN sent a text message to NOEL MOTT, which stated, "You got any blues [Oxycodone pills]."

42. On or about August 5, 2018, at approximately 4:56 p.m., NOEL MOTT sent a text message to CYNTHIA HUFFMAN, which stated, "They said its 15 [Fifteen Oxycodone pills] left."

43. On or about August 7, 2018, at approximately 2:28 p.m., NOEL MOTT called MEGAN MORITZ on the telephone. During the call, MORITZ stated, "Hello." MOTT stated, "Hey." MORITZ stated, "Hey." MOTT stated, "Um, um, Tez had gave you somethin' [Oxycodone pills] last time you had went back down." MORITZ stated, "Tez said what?" MOTT stated, "Tez had gave you somethin' and you was supposed to give to me." MORITZ stated, "The . . . I put it in the bag with the weed." MOTT stated, "Damn, dude, I didn't even know. I threw that bag away and everything." MORITZ stated, "Shut up, I told BOONE [ROBERT BOONE] to tell you." MOTT stated, "He ain't never told me. Open the door." MORITZ stated, "He's the one that put it in there for me." MOTT stated, "I didn't even know. Ain't nobody. [MOTT yells in background] Hey BOONE [ROBERT BOONE], [MOTT having a conversation with BOONE in the background] the bag where you put the weed up in the linen closet. I almost threw the bag away, I didn't know them pills were in there, bro. She just said you was supposed to tell me." BOONE stated, "She put em' in?" MOTT stated, "I didn't know nothin' till the dude just called about his money, bro. Hello?" MORITZ stated, "Hello." MOTT stated, "Yeah, yeah, I'm just now hearing about it. He done just called askin' if his pills is done." MORITZ stated, "Oh yeah, I put em' in there, I put em' all together 'cause he said, 'cause you was. He said you was asleep and I wanted to go home." MOTT stated, "I didn't even know he sent that s**t. I almost took that s**t out and threw the bag away." MORITZ stated, "Damn! Um, um, um."

44. On or about August 7, 2018, at approximately 3:00 p.m., MEGAN MORITZ called NOEL MOTT on the telephone. During the call, MORITZ stated, "Hello." MOTT stated, "Hey Mia, where those pills that was in there?" MORITZ stated, "What. What?" MOTT stated, "What they was in a regular sandwich bag?"

45. On or about August 7, 2018, at approximately 4:10 p.m., MEGAN MORITZ sent a text message to NOEL MOTT, which stated, "Did u find them??"

46. On or about August 7, 2018, at approximately 4:25 p.m., NOEL MOTT sent a text message to MEGAN MORTIZ, which stated, "Yea all the way in Detroit."

47. On or about August 9, 2018, at approximately 12:34 p.m., ASHLIE SMITH called NOEL MOTT on the telephone. During the call, MOTT stated, "Yeah." SMITH stated, "Uh, you still got them orange things [Oxycodone pills]?" MOTT stated, "Yeah." SMITH stated, "Alright. What's the ticket [price]?" MOTT stated, "Twenty [\$20]. They on Adams." SMITH stated, "They're on Adams?" MOTT stated, "Yeah." SMITH stated, "Alright, well my uncle is supposed to be wantin' some, but he don't like the ones I want so, or the ones I got." MOTT stated, "Alright. I got 'em." SMITH stated, "So, but I'll be there in a minute. I just wanted to make sure you had 'em." MOTT stated, "Alright." SMITH stated, "Alright, bye."

48. On or about August 11, 2018, at approximately 3:49 p.m., TARYN OHL sent a text message to NOEL MOTT, which stated, "What did u say they was? The blue football s [Oxycodone 30 mg pills]?"

49. On or about August 12, 2018, at approximately 1:28 p.m., TARYN OHL sent a text message to NOEL MOTT, which stated, "I need 20 [20 Oxycodone pills] more."

50. On or about August 12, 2018, at approximately 7:31 p.m., TARYN OHL sent a text message to NOEL MOTT, which stated, "Can I come get them now."

51. On or about August 12, 2018, at approximately, 7:32 p.m., TARYN OHL called NOEL MOTT on the telephone. During the call, an Unknown Male answered MOTT's phone and stated, "Hello." OHL stated, "Hey." The Unknown Male stated, "Hey." OHL stated, "Hey, can I come grab them now [Oxycodone pills]?" The Unknown Male stated, "Hold on a second." OHL stated, "Alright." The Unknown Male stated, "Hey bro. Hold, he was upstairs, he [NOEL MOTT] comin'." MOTT stated, "Hello." OHL stated, "Hey what's up?" MOTT stated, "What up doe?" OHL stated, "Hey, can I come grab, get them?" MOTT stated, "How many you need?" OHL stated, "Umm, for the blue ones 18 [18 Oxycodone pills], the yellow [Oxycodone 30 mg pills] however many." MOTT stated, "Hold on, hold on, hold on let me see what's what. Alright, I'm call you when I hit Adams. I'm about to got to Adams." OHL stated, "Alright." MOTT stated, "Alright." OHL stated, "Do you know about how long?" MOTT stated, "Probably like 20 minutes. Give me like 20, 30 minutes." OHL stated, "Alright. Alright."

52. On or about August 12, 2018, at approximately 8:05 p.m., NOEL MOTT sent a text message to TARYN OHL, which stated, "I'm here."

53. On or about August 12, 2018, at approximately 9:46 p.m., IVAN TROUP called NOEL MOTT on the telephone. During the call, TROUP stated, "Cuz." MOTT stated, "Yeah." TROUP stated, "Hey, look the n***a ain't answering right." MOTT stated, "Um hmm." TROUP stated, "So the ah, what I had down there and I'm a get it as soon as I talk to him or unless you want me to have them wait for him. It's up to you." MOTT stated, "What you talkin' about?" TROUP stated, "For that 500 [500 Oxycodone pills]." MOTT stated, "Felicia [FELICIA MCPHERSON] got a dude sittin' over there waitin' right now to with 190 [190 Oxycodone pills], 180." TROUP stated, "So you want me to give him the money for that to go to Felicia [FELICIA MCPHERSON]?" MOTT stated, "Yeah." TROUP stated, "Alright." MOTT stated, "And then ah, Smoke gave you the weed right?" TROUP stated, "Yeah." MOTT stated,

"Alright." TROUP stated, "Alright, so I'm gonna take the 190 [190 Oxycodone pills] out of the 6 \$6,000]." MOTT stated, "Yep and then the rest you can spend tomorrow." TROUP stated, "Alright." MOTT stated, "Hey call Felicia and tell her he on the way to you. You about to leave." TROUP stated, "I, I, I, I'm about to call her and make sure yeah but I got . . . comin' to them." MOTT stated, "Alright."

54. On or about August 13, 2018, at approximately 9:47 a.m., JASON REID called NOEL MOTT on the telephone. During the call, MOTT stated, ". . ." REID stated, "Oh man, I can't call it. Uh, it's up the road?" MOTT stated, "You say what?" REID stated, "Up the road?" MOTT stated, "What you need, some blues [Oxycodone pills]?" REID stated, "Yeah." MOTT stated, "I'm about to go down to the house in the next block." REID stated, "Oh, you goin', okay, okay. Okay." MOTT stated, "Down to the spot." REID stated, "I been up her for like two days. Yeah, yeah, I know what you're talkin' about. I been here for like two days. Ain't nobody answerin', answerin' this door." MOTT stated, "We was down the street yesterday." REID stated, "Oh, okay, alright. . . . I'll be outside. I'll be outside." MOTT stated, "Alright."

55. On or about August 15, 2018, at approximately 9:59 a.m., NOEL MOTT called MARCUS CALDWELL on the telephone. During the call, CALDWELL stated, "Hello." MOTT stated, "What up doe?" CALDWELL stated, "Hey, these yellow ones [Oxycodone 30 mg pills] was thirties [30 mg] too, right?" MOTT stated, "You say what?" CALDWELL stated, "Them yellow ones, they thirties too, right?" MOTT stated, "Yeah." CALDWELL stated, "Okay." MOTT stated, "I sent TESS [TESSA CHRISTY] there. She came and got 'em all?" CALDWELL stated, "Uh, she didn't get 'em all, but I guess, well, I didn't know, uh, them was thirties, but she got damn near all of 'em." MOTT asked, "How man, damn, she wanted all of 'em, didn't she?" CALDWELL stated, "Uh, I think so, but I didn't know these was thirties." MOTT stated, "But you didn't sell her no yellow?" CALDWELL stated, "No, I didn't sell her no

yellow.” MOTT stated, “I got to send her back. I’m gettin’ ready to leave the roads. I thought they was sold.” CALDWELL stated, “Oh, I mean s**t, tell her come back then. I didn’t, I didn’t know.”

56. On or about August 15, 2018, at approximately, 10:00 a.m., NOEL MOTT called TESSA CHRISTY on the telephone. During the call, CHRISTY stated, “Hello.” MOTT stated, “You can go back and get the rest of them, TESS. He talkin’ about he didn’t know them yellows was thirties [Oxycodone 30 mg pills].” CHRISTY stated, “Oh, okay.” MOTT stated, “Alright.” CHRISTY stated, “I will. I will. Alright, bye.” MOTT stated, “Yep.”

57. On or about August 15, 2018, at approximately, 10:36 a.m., NOEL MOTT called TESSA CHRISTY on the telephone. During the call, MOTT stated, “He didn’t say nothin’ to her about the yellows. He didn’t know they was thirties [Oxycodone 30 mg pills].” CHRISTY stated, “Hello.” MOTT stated, “How many total did you want TESS?” CHRISTY stated, “Um, I gotta, I gotta do some . . . real quick . . .” MOTT stated, “Alright, I need to know ‘cause we down to the last and I’m about to leave. I’m tryin’ to get you square before I leave. You heard me?” CHRISTY stated, “Give me another hundred and thirty of ‘em [130 Oxycodone 30 mg pills].” MOTT stated, “Alright. I’m about to go see what’s what. I’ll text you.” CHRISTY stated, “Okay, I’m just runnin’ around right now. I’m in Little Kentucky. I got like a couple people I’m waitin’ on to meet. That’s why I was, I was gonna come, but it was just gonna be a little bit ‘cause I had some people already on the way.” MOTT stated, “Ain’t gonna be none in a little bit. That’s why I was . . .” CHRISTY stated, “Aw s**t. Well, let me know. I’ll come grab ‘em.” MOTT stated, “Alright. I’m on my way there, over there now. He had ‘em there and didn’t say nothin’ to you. Yeah, alright.” CHRISTY stated, “Alright.”

58. On or about August 15, 2018, at approximately 10:37 a.m., NOEL MOTT called MARCUS CALDWELL on the telephone. During the call, CALDWELL stated, “Hello.”

MOTT stated, "Hey bro, whenever they come for pills and they want x amount." CALDWELL stated, "Uh-huh." MOTT stated, "All pills sell. Not just thirties, bro. Two pills equal a thirty." CALDWELL stated, "Right. I understand that. I didn't know what they were, bro. I didn't know that until I ask dude what they was. And she had already came here and left." MOTT stated, "Oh damn! Hell yeah, that." CALDWELL stated, "I didn't do it on purpose. I promise I didn't do it on purpose." MOTT stated, "I know that. I know, I know that. That was just a six thousand dollar play [\$6,000 drug deal], that's all." CALDWELL stated, "Right and I apologize. I just, I didn't know what they was. I called your phone, but you didn't answer." MOTT stated, "I was in the shower." CALDWELL stated, "So dude, I asked dude what they was, and he told me." MOTT stated, "All you gotta do is Google what they is, bro. All you gotta do is uh, type in the number on the pill. Yellow round pill with such and such." CALDWELL stated, "Right." MOTT stated, "And it, and it come up, it'll tell you what it is. All, always if you don't know, don't ask, you ain't even gotta ask nobody. Just Google it yourself." CALDWELL stated, "Uh-huh." MOTT stated, "And then eventually, you don't even have to do that 'cause you'll be knowin' it all by heart." CALDWELL stated, "Right. I'll be, I'll be knowin'. Right, right, right." MOTT stated, "Yeah, hell yeah. Alright, I'll be there in a minute." CALDWELL stated, "Alright." MOTT stated, "I need to know what's the count 'cause I just talked to her." CALDWELL stated, "I'm, I'm countin' 'em right now." MOTT stated, "Alright." CALDWELL stated, "Alright."

59. On or about August 15, 2018, at approximately 6:00 p.m., MIRANDA HAMILTON called NOEL MOTT on the telephone. During the call, MOTT stated, "Hello." HAMILTON stated, "Hey." MOTT stated, "What up doe?" HAMILTON stated, "Um, I got someone looking for some bars [Xanax bars]." MOTT stated, "Hmmm, I ain't got no more left. Not going to have none until tomorrow." HAMILTON stated, "Until tomorrow?" MOTT stated,

"Yep." HAMILTON stated, "Alright, well I will hit you up tomorrow and see if they still want them or so, so." MOTT stated, "Alright." HAMILTON stated, "Alright, talk to you later."

60. On or about August 15, 2018, at approximately 9:05 p.m., SETH WELLS sent a text message to NOEL MOTT, which stated, "I got someone that needs a few blues [Oxycodone pills] but didn't know how long you'd be."

61. On or about August 16, 2018, at approximately 10:31 a.m., DONALD ADAMS called NOEL MOTT on the telephone. During the call MOTT stated, "Hello." ADAMS stated, "Hey. Good mornin'." MOTT stated, "What's goin' on?" ADAMS stated, "Hey man . . ." MOTT stated, "I'm gettin' ready to get up and head that way now. What time your people gonna be ready, or they ready already?" ADAMS stated, "Uh, he been ready. Got his stuff yesterday." MOTT stated, "Right, he gonna hold on for me?" ADAMS stated, "Yeah, about what time . . ." MOTT stated, "I'm about to send a, I'm gettin' dressed now. About to pay my driver. I'm about to send him that way. He probably be leavin' out forty-five minutes to an hour." ADAMS asked, "About what time, three o'clock? Four o'clock or somethin'?" MOTT stated, "Yeah, three, four o'clock." ADAMS stated, "Uh." MOTT stated, "Alright. Eighty [80 Oxycodone pills] right?" ADAMS stated, "Yeah." MOTT stated, "Alright." ADAMS stated, "Alright."

62. On August 16, 2018, at approximately 4:09 p.m., NOEL MOTT called IVAN TROUP on the telephone. During the call, TROUP stated, "Hello." MOTT stated, "What up doe?" TROUP stated, "What up cuz?" MOTT stated, "Um dude BOONE [ROBERT BOONE] about to head that way I'm about to send uh some money with him." TROUP stated, "Alright . . ." MOTT stated, "Um, instead of . . . I'm sending 53 [\$5,300] with him." TROUP stated, "53?" MOTT stated, "Yeah." TROUP stated, "Alright, but I should be able to spend that 'cause FELICIA [MCPHERSON] got something for you. Uh, that I had, uh, called you the extra 120 [120 Oxycodone pills]. So I, I paid up to cover all this, you know that." MOTT stated, "Alright,

then what I already got, what I got there? Twelve hundred [\$1,200] there or something like that.” TROUP stated, “Yep, I got four hundred [\$400].” MOTT stated, “Alright and you got what eight hundred [\$800] coming back or something like that? How much you got coming back?” TROUP stated, “It was, it was uh two, nine. And then if you were throwing me something off that other side like eight. Hello.” MOTT stated, “Hold on I’m, I’m going through . . . I don’t know . . . Alright, so I’ll talk to you when the money gets there.” TROUP stated, “Alright.” MOTT stated, “Alright.”

63. On or about August 16, 2018, at approximately 5:32 p.m., MARKELL BOYD called NOEL MOTT on the telephone. During the call, MOTT stated, “Hello?” BOYD stated, “What up?” MOTT stated, “What up though?” BOYD stated, “You got some bigs [Oxycodone 30 mg pills]?” MOTT stated, “Yeah, they on the south end.” BOYD stated, “Okay, what you want . . . ?” MOTT stated, “What you tryin’ to do?” BOYD stated, “Shit, hold on one second, I’ll tell you right now . . .” MOTT stated, “eight thirty, on the wholesale.” BOYD stated, “Uh, okay, oh.” MOTT stated, “Alright.” BOYD asked someone in the background, “How many do you want?”

64. On or about August 16, 2018, at approximately 7:51 p.m., ROBERT BOONE called NOEL MOTT on the telephone. During the call, MOTT stated, “Hello?” BOONE stated, “Bro.” MOTT stated, “Yeah.” BOONE stated, “Hey, you, uh, you want 200 bars [200 Xanax bar pills]?” MOTT stated, “Mm, you have to see what IVAN [TROUP] got on, um if all that’s gone . . .” BOONE stated, “Alright.” MOTT stated, “Alright.” BOONE stated, “See how much he got left after all that.”

65. On or about August 17, 2018, at approximately 10:49 a.m., JASON REID called NOEL MOTT on the telephone. During the call, REID stated, “What up?” MOTT stated, “Hello?” REID stated, “What’s good?” REID stated, “Nah man, I’m about to head up the road

can you tell them, have that ready for me [Oxycodone pills]?" MOTT stated, "Alright." REID stated, "Alright, I'll be comin' up there now . . ."

66. On or about August 17, 2018, at approximately 5:30 p.m., MIRANDA HAMILTON sent a text message to NOEL MOTT, which stated, "Got Someone looking for the blues [Oxycodone pills]."

67. On or about August 17, 2018, at approximately 5:34 p.m., NOEL MOTT sent a text message to MIRANDA HAMILTON, which stated, "On Adams."

68. On or about August 17, 2018, at approximately 5:35 p.m., MIRANDA HAMILTON sent a text message to NOEL MOTT, which stated, "Okay."

69. On or about August 17, 2018, at approximately, 8:29 p.m., WILLIAM NORRIS called NOEL MOTT on the telephone. During the call, MOTT stated, "What up though?" NORRIS stated, "Boss, you got blues [Oxycodone pills]?" MOTT stated, "Yeah, they over there." NORRIS stated, "Alright, I need like three hundred [300 Oxycodone pills]." MOTT stated, "They over there." NORRIS stated, "Alright."

70. On or about August 17, 2018, at approximately 9:01 p.m., NOEL MOTT called MARCUS CALDWELL on the telephone. During the call, CALDWELL stated, "Hello?" MOTT stated, "What up? Bill [WILLIAM NORRIS] there already?" CALDWELL stated, "Yeah, he just left." MOTT stated, "He bought 350 [350 Oxycodone pills]?" CALDWELL stated, "Uh, uh, yeah somethin', yeah." MOTT stated, "So he bought me out then, right?" CALDWELL stated, "Pretty much." MOTT stated, "Ain't no, pretty much, he f****n, bought me out before anything." CALDWELL stated, "It's only like 10 pills . . ." MOTT stated, "S**t, how he didn't, how he didn't get 'em?" CALDWELL stated, "One, two, three, four, five, six, seven, eight, nine, ten pills." MOTT stated, "What are they? Fifteen [mg] and thirties [mg]?" CALDWELL stated, "It's two, uh four fifteens [4 Oxycodone 15 mg pills] and the rest of 'em is

thirties [Oxycodone 30 mg pills]." MOTT stated, "Alright, alright . . ." CALDWELL stated, "Tryin' to come over here." MOTT stated, "Yeah, I'm waitin' on this car to pull out and then I'm gonna pull in." CALDWELL stated, "Alright." MOTT stated, "Alright."

71. On or about August 20, 2018, at approximately 3:20 p.m., DEVON TROUP called NOEL MOTT on the telephone. During the call, TROUP stated, "Hey cuz." MOTT stated, "Yeah." TROUP stated, "Hey, hey, me and BOONE [ROBERT BOONE] about to ride, ride to the house, I was about to uh, drop this s**t off while I'm out, so I don't got this s**t on me." MOTT stated, "You're 'bout to ride to what house?" TROUP stated, "To, uh on Adams, just to drop this s**t off, so I don't have. . ." MOTT stated, "Oh, alright." TROUP stated, "But, hey, hey." MOTT stated, "What?" TROUP stated, "Uh, I got 161 [161 Oxycodone pills]." MOTT stated, "Oh alright, I ain't got but a 100 [100 Oxycodone pills] myself." TROUP stated, "I mean I'm just letting you know, I'm letting you know." MOTT stated, "Alright." TROUP stated, "Alright."

72. On or about August 20, 2018, at approximately 4:35 p.m., NOEL MOTT sent a text message to MIRANDA HAMILTON, which stated, "Was seeing if wanted to drive [drive to Detroit to pick up Oxycodone pills]."

73. On or about August 20, 2018, at approximately 4:36 p.m., MIRANDA HAMILTON sent a text message to NOEL MOTT, which stated, "Hell yeah I want to."

74. On or about August 20, 2018, at approximately 4:39 p.m., NOEL MOTT sent a text message to MIRANDA HAMILTON, which stated, "We are going to be dirty [transporting Oxycodone pills] coming bk."

75. On or about August 20, 2018, at approximately 10:07 p.m., DEVON TROUP called NOEL MOTT on the telephone. During the call, TROUP stated, "Hello." MOTT stated, "What up doe?" TROUP asked, "S**t you all left already?" MOTT stated, "Damn I'm glad you

just called, I'm on Southfield what you need me to do?" TROUP stated, "Just them 56 [56 Oxycodone pills] out of my house." MOTT stated, "Who there?" TROUP stated, "My girl. MOTT stated, "You want me to grab them from her?" TROUP stated, "Yeah." MOTT stated, "Alright." TROUP stated, "I'm about to call her and let her know you bout to pull up." MOTT stated, "Alright."

76. On or about August 21, 2018, at approximately 12:49 p.m., MARKELL BOYD called NOEL MOTT on the telephone. During the call, BOYD stated, "Um, what I was callin' you for though is you got the biggies [Oxycodone 30 mg pills], right?" MOTT stated, "Yeah, they over at the house." BOYD stated, "What's the best you can do on twenty [20 Oxycodone 30 mg pills]?" MOTT stated, "Shit, man I already told you the wholesale price?" BOYD stated, "Okay." MOTT stated, "Alright." BOYD stated, "Alright, what's up though? What you got crackin'?" MOTT stated, "Huh?" BOYD stated, "What you got crackin'?" MOTT stated, "Gettin' ready to head to the house."

77. On or about August 23, 2018, at approximately 10:42 a.m., NOEL MOTT called MARCUS CALDWELL on the telephone. During the call, CALDWELL stated, "Hello." MOTT stated, "What up doe?" CALDWELL stated, "[inaudible]." MOTT stated, "What you all been doin'?" CALDWELL stated, "[inaudible]." MOTT stated, "I can't hear nuttin' brother." CALDWELL stated, "I said, I ain't doin' s**t. I said, I'm sittin' here talkin' to your cousin, listenin' to this instrumental he had." MOTT stated, "Oh. You talkin' about Juan?" CALDWELL stated, "[inaudible]" MOTT stated, "Yeah, who it over there lookin' like?" CALDWELL stated, "S**t. It's a couple grand here, but it really ain't, it's only been two people here today." MOTT stated, "Uh, hmm. Anybody else been complainin' about nuttin'?" CALDWELL stated, "Naw. Nope. No. Oh, Boy BULL [JASON REID] tryin' to get some, you know, his . . . He walkin' in the door now. But I didn't do it though." MOTT stated, "Right. Did he pay his ticket [drug debt]

off?" CALDWELL stated, "[inaudible]." MOTT stated, "Hmm?" CALDWELL stated, "Hold on. What, what you say?" MOTT stated, "Did he pay his ticket off?" CALDWELL stated, "Yeah, yeah, yeah, he did that. I just, that's what I said, I didn't give him no more 'cause you told me not to." MOTT stated, "Yeah, um, what I was about to say? Um, oh, how many zips [ounces of marijuana] was left?" CALDWELL stated, "Uh, I just bagged 'em this mornin'. It was it was two. Two and a half left. But I just bagged 'em up this mornin'." MOTT stated, "Alright, that's what I was about to say. So I'll send this n***a with some weed over there." CALDWELL stated, "Alright." MOTT stated, "How many blues [Oxycodone pills] you got?" CALDWELL stated, "Um, about twenty, I think. Let me see, I don't even think there's twenty." MOTT stated, "BILL [NORRIS] ain't been comin' through?" CALDWELL stated, "Uh, huh, came over here last night." MOTT stated, "You haven't seen BILL [WILLIAM NORRIS] in a couple days?" CALDWELL stated, "Not since the other day." MOTT asked, "F**k that n***a been at?" CALDWELL stated, "I don't know. Um, we called him yesterday, to ask him what was up" MOTT stated, "Hmm. Alright." MOTT stated, "I'll call you back." CALDWELL stated, "Alright."

78. On or about August 24, 2018, WILLIAM NORRIS met a person cooperating with law enforcement [hereinafter referred to as Source 2] at ** Alpine Drive, Mansfield, Ohio. During the meeting, NORRIS sold 25 blue tablets, containing .75 grams of Oxycodone for \$875 to Source 2.

79. On or about August 24, 2018, at approximately, 7:31 p.m., NOEL MOTT called TESSA CHRISTY on the telephone. During the call, CHRISTY stated, "Hello?" MOTT asked, "You still need this 150 [150 Oxycodone pills] right?" CHRISTY stated, "No just one, uh, a hundred [100 Oxycodone pills]." MOTT stated, "A hundred?" CHRISTY stated, "Right this second, yeah." MOTT stated, "Alright, alright, I was just tryin' to find out. That's all I'm gonna

have at the house.” CHRISTY stated, “Okay.” MOTT stated, “Alright.” CHRISTY stated, “Oh yeah, I’m sittin’ here at your house.” MOTT stated, “Alright, I’m on my way back there now.” CHRISTY stated, “Okay.”

80. On or about August 25, 2018, at approximately, 4:52 p.m., WILLIAM NORRIS called NOEL MOTT on the telephone. During the call, NORRIS stated, “Hey boss.” MOTT stated, “What up?” NORRIS stated, “You got on two, 250?” MOTT stated, “Mm, yup.” NORRIS stated, “Alright, I’m gonna go collect this money up.” MOTT stated, “Call me when you ready. I’m gonna have to meet you on Adams, at 220.” NORRIS stated, “Okay.” MOTT stated, “Alright.”

81. On or about August 27, 2018, MARKELL BOYD met a person cooperating with law enforcement [hereinafter referred to as Source 3] in the area of Surrey Road and North Main Street in Mansfield, Ohio. During the meeting, BOYD sold .09 grams of fentanyl for \$120 to Source 3.

82. On or about August 28, 2018, MARKELL BOYD met Source 3 at Voegelé Apartments, *** North Main Street, apartment #G2, Mansfield, Ohio. During the meeting, BOYD sold .05 grams of heroin for \$120 to Source 3.

83. On or about August 28, 2018, at approximately 7:58 p.m., NOEL MOTT called CYNTHIA HUFFMAN on the telephone. During the call, MOTT stated, “I got to the South.” HUFFMAN stated, “Sleep man.” MOTT stated, “I got to come to the South now though because I think he out of blues [Oxycodone pills]. Last time I talk to him, I think he said he only had a couple left. That was before I fell asleep.” HUFFMAN stated, [speaking with SETH WELLS in background] “SETH, when you went up there how many blues [Oxycodone pills] did he have left? Yeah, SETH said he didn’t have many, he just ran for somebody.” MOTT stated, “Alright, I’m about to take some over there.” HUFFMAN stated, “Alright, what you about to do?” MOTT

stated, "Hmm." HUFFMAN stated, "Come over here?" MOTT stated, "What you mean? I need to come over there?" HUFFMAN stated, "No I just said what you about to do? Do you want us to come get 'em [Oxycodone pills] and bring them over here?" MOTT stated, "No I'm about to take 'em." HUFFMAN stated, "Alright." MOTT stated, "Alright." HUFFMAN stated, "Alright, bye."

84. On or about August 29, 2018, at approximately 12:51 p.m., NOEL MOTT called ROBERT BOONE on the telephone. During the call, BOONE stated, "Hello." MOTT stated, "You went to Adams already?" BOONE stated, "Yeah. I'm . . . coming down Park Ave." MOTT stated, "Damn, I need a 50 [bag of 50 Oxycodone pills] pack from down there." BOONE stated, "Damn, you want me uh, want me get those . . . out?" MOTT stated, "Yeah. Bring a 50 pack. BOONE asked, "Over there? MOTT stated, "Naw, DB [MARCUS CALDWELL] got it. BOONE stated, "Alright, I'm about to go there right now."

85. On or about August 29, 2018, at approximately 3:33 p.m., NOEL MOTT sent a text message to CYNTHIA HUFFMAN, which stated, "See if Seth [SETH WELLS] want to drive [to Detroit for a drug run] I'm ready."

86. On or about August 29, 2018, at approximately 3:35 p.m., CYNTHIA HUFFMAN sent a text message to NOEL MOTT, which stated, "he said yeah can you bring him something?"

87. On or about August 29, 2018, at approximately 4:17 p.m., CYNTHIA HUFFMAN called NOEL MOTT on the telephone. During the call, MOTT stated, "Hello." HUFFMAN stated, "Hello." MOTT stated, "What up doe?" HUFFMAN stated, "Hey ah, someone got a hold of me. I don't know if you want them or not. But they're selling a 12 gauge [12 gauge shotgun], um, a .22 [.22 caliber rifle] and I want to say like a 14 gage or somethin'." MOTT stated, "A 14 gage?" HUFFMAN stated, "A 410 [.410 gauge shotgun] or somethin'." MOTT stated, "They sellin' three guns?" HUFFMAN stated, "Yeah." MOTT stated, "Yeah, I'm cool on them though."

HUFFMAN stated, "Huh?" MOTT stated, "I said I'm cool on all of them." HUFFMAN stated, "Alright, I just didn't know they just had messaged me." MOTT stated, "Alright." HUFFMAN stated, "Alright."

88. On or about August 30, 2018, at approximately 7:32 p.m., NOEL MOTT called DEVON TROUP on the telephone. During the call, MOTT stated, "What up doe? What you doing?" TROUP stated, "S**t, on the road . . ." MOTT stated, "I was about to tell you I'm about to send dude that way. I was about to see you want me send your money." TROUP stated, "What hold on I didn't hear you. I ain't even got no money." MOTT stated, "I thought you had some blues [Oxycodone pills] down there." TROUP stated, "Yeah ah, s**t. There was only 150 [150 Oxycodone pills], I can't remember. I, I got that yesterday." MOTT stated, "Oh what, that, some stragglers that was left?" TROUP stated, "Yeah some stragglers." MOTT stated, "Naw, I'm talking about the blues [oxycodone] that were left, was some stragglers." TROUP stated, "Naw, there was only like a 100. I only had." MOTT stated, "100 left?" TROUP stated, "Naw, I'm saying like, like 100." MOTT stated, "Oh, so them, so that oh, that's probably was Juan's blues than. You got some blues now?" TROUP stated, "Yeah they, they should be there. There's only like 98 [98 Oxycodone pills] or some s**t, or 80 [80 Oxycodone pills] or some s**t." MOTT stated, "They gone then. That's what I'm saying." TROUP stated, "Oh s**t, I'm already on my way there. You might as well just leave it." MOTT stated, "You got some with you?" TROUP stated, "Yeah, I got some with me." MOTT stated, "Alright bet." TROUP stated, "Bet." MOTT stated, "How long till you pull up?" TROUP stated, "Ah, I say about two flats, honestly." MOTT stated, "Alright."

89. On or about August 31, 2018, at approximately 10:10 a.m., NOEL MOTT called SETH WELLS on the telephone. During the call, WELLS stated, "Hello?" MOTT stated, "What up doe?" WELLS stated, "Hey what's up?" MOTT stated, "Where did you put the one things?"

WELLS stated, "What you say?" MOTT stated, "Where did you put the blues [Oxycodone pills] at?" WELLS stated, "Oh, out there on Adams. I got on . . . and I didn't know when you were going to be up so I didn't want to have them much of the afternoon 'cause there was nothing around." MOTT stated, "You be there now?" WELLS stated, "Yeah." MOTT stated, "Alright. Alright. That is cool." WELLS stated, "Alright." MOTT stated, "Alright, hey."

90. On or about August 31, 2018, at approximately 8:47 p.m., MARCUS CALDWELL called NOEL MOTT on the telephone. During the call, CALDWELL stated, "We out of smoke." MOTT stated, "You out of smoke [marijuana]?" CALDWELL stated, "Yeah." MOTT stated, "Uh, I got some down the street. At the other house." CALDWELL stated, "Alright." MOTT stated, "In the kitchen drawer by the refrigerator." CALDWELL stated, "Alright. . ." MOTT stated, "You going to get. . ." CALDWELL stated, "I'm going to go grab it right now." MOTT stated, "Alright, if you get all the bread [drug money] together, I'll send ASHLIE [ASHLIE SMITH] to come pick it up." CALDWELL stated, "Alright it's all together." MOTT stated, "Huh?" CALDWELL stated, "It's all together." MOTT stated, "Oh alright."

91. On or about August 31, 2018, at approximately 9:20 p.m., ASHLIE SMITH called NOEL MOTT on the telephone. During the call, SMITH stated, "Hey." MOTT stated, "Yeah?" SMITH asked, "I got two questions. Do I got to sit here and count it [drug money]?" MOTT stated, "Naw you need to come straight back here." SMITH stated, "And, uh, can I have a bar [Xanax bar]?" MOTT stated, "Come straight back here with that money [drug money], that's all I'm worried about." SMITH stated, "Okay."

92. On or about September 1, 2018, at approximately 9:59 p.m., MARKELL BOYD called NOEL MOTT on the telephone. During the call, BOYD stated, "What up doe?" MOTT stated, "Man those boys are hard as hell . . . cuz. What up what's good?" BOYD stated, "Huh?" MOTT stated, "What up doe?" BOYD stated, "You uh, got the little ones [Oxycodone pills] over

there too?" MOTT stated, "I will later on tonight." BOYD stated, "[inaudible] over there." MOTT stated, "You talking about on the blues?" BOYD stated, "Yeah, the 30s [Oxycodone 30 mg pills]." MOTT stated, "Okay, mm, hmm."

93. On or about September 3, 2018, at approximately 10:40 p.m., NOEL MOTT called IVAN TROUP on the telephone. During the call, TROUP stated, "What up cuz?" MOTT stated, "What up though? What you doin'?" TROUP stated, "Um, on my way to . . . crib." MOTT stated, "Oh." TROUP stated, "Some little n***a over there need some . . ." MOTT stated, "Ah, um how much that ticket [debt for drugs] was?" TROUP stated, "Uh 2650 [\$2,650], plus the uh, the uh 130 [130 Oxycodone pills]." MOTT stated, "Alright, I sent um an even six [\$6,000] wit 'em. I ain't never do the math to see what it was." TROUP stated, "Ah MOTT stated, "So I'm probably gonna owe you a couple more dollars still." TROUP stated, "Another 550 [\$550]." MOTT stated, "Alright." TROUP stated, "Alright." MOTT stated, "Yup." TROUP stated, "What, what time are you? He just left?" MOTT stated, "Yeah, he just left about ten, fifteen, twenty minutes ago." TROUP stated, "Alright, tell her to call me 'cause I might not be at this crib." MOTT stated, "Alright." TROUP stated, "Alright, or was he goin' somewhere else?" MOTT stated, "How I'm gonna tell him to call you, he gone, n***a?" TROUP stated, "Naw, naw, I'm sayin', I'm talkin' about, uh, was he comin' to me? Or was he goin' somewhere else?" MOTT stated, "Naw, he just said he was goin' home. He was like, I'm about to go let me get my brother money. I was like alright." TROUP stated, "Oh, oh, you talkin' bout DEV [DEVON TROUP]? I thought someone else was comin'. Alright, good." MOTT stated, "Naw, DEV, alright." TROUP stated, "Alright, bet." MOTT stated, "Yup."

94. On or about September 4, 2018, at approximately 10:20 a.m., ASHLIE SMITH called NOEL MOTT on the telephone. During the call, SMITH stated, "My other phone died. Where you at?" MOTT stated, "On Adams right now." SMITH stated, "Where do I gotta come

to?" MOTT stated, "What are you tryin' to do?" SMITH asked, "What do you want me to do?" MOTT stated, "The dogs ain't been fed. I ain't been to the house." SMITH stated, "I know." MOTT stated, "Oh, go to the house. My daughter and them there." SMITH stated, "Alright, what do you got?" MOTT stated, "What you mean?" SMITH stated, "I'm sick." MOTT stated, "I got the same gray stuff [heroin]." SMITH stated, "Alright, I'll be there to grab some." MOTT stated, "Alright." SMITH stated, "Alright."

95. On or about September 4, 2018, at approximately 7:47 p.m., CYNTHIA HUFFMAN called NOEL MOTT on the telephone. During the call, MOTT stated, "Nothin', taking care of some business. What up doe?" HUFFMAN stated, "Ah, I was gonna see if you had any blues [Oxycodone pills] down there still?" MOTT stated, "Um, no I don't." HUFFMAN stated, "You don't?" MOTT stated, "Nope, they got some down the street though." HUFFMAN stated, "Where on Adams?" MOTT stated, "Yep." HUFFMAN stated, "No he said he's out." MOTT stated, "Oh, okay, we out then. SETH [SETH WELLS] contacting them right now and about to head this way though." HUFFMAN stated, "Alright." MOTT stated, "Alright."

96. On or about September 4, 2018, at approximately 6:51 p.m., NOEL MOTT called SETH WELLS on the telephone. During the call, WELLS stated, "Hello." MOTT stated, "Hey." WELLS stated, "Yeah." MOTT stated, "When you go to big girl house, just pay her for the 60 [60 Oxycodone pills]." WELLS stated, "Okay." MOTT stated, "And the \$1,900 gonna go to Q. Q gonna meet you on Littlefield at Lavar house." WELLS stated, "Alright." MOTT stated, "Alright, let me know when you on your way to Q house. I mean Lavar." WELLS stated, "Alright." MOTT stated, "Alright." WELLS stated, "Alright."

97. On or about September 5, 2018, at approximately 8:44 p.m., ROBERT BOONE called NOEL MOTT on the telephone. During the call, BOONE stated, "Aye, aye, how much am I supposed to be giving for that 140 [140 Oxycodone pills] on south . . ." MOTT stated, "On

Littlefield?" BOONE stated, "Yeah, Marv." MOTT stated, "Uh 23 [\$23 per pill]." BOONE stated, "23. Even?" MOTT stated, "Naw, naw, 23 times 140." BOONE stated, "Awe, okay, okay." MOTT stated, "The same as." BOONE stated, "Alright, yep." MOTT stated, "Yep."

98. On or about September 5, 2018, at approximately 3:03 p.m., FELICIA MCPHERSON called NOEL MOTT on the telephone. During the call, MCPHERSON stated, "Hello? Hello?" MOTT stated, "What up though?" MCPHERSON stated, "How we um, how we lookin' on the 180 [180 Oxycodone pills]?" MOTT stated, "We getting 'em." MCPHERSON stated, "I know but like what, what time?" MOTT stated, "Sendin' SETH [SETH WELLS] out real soon, I'm waitin' on DB [MARCUS CALDWELL] to get back and handle this other money. Then I'm sendin' 'em out." MCPHERSON stated, "Alright, so I can tell 'em before seven?" MOTT stated, "Yeah." MCPHERSON stated, "Alright bet." MOTT stated, "Yup."

99. On or about September 5, 2018, at approximately 11:27 p.m., FELICIA MCPHERSON sent a text message to NOEL MOTT, which stated, "They got 177 [177 Oxycodone pills] for u and I sent 85teen [85 Oxycodone 15 mg pills] & 57 big [57 Oxycodone 30 mg pills] so a total of 99 big [99 Oxycodone 30 mg pills]."

100. On or about September 7, 2018, SETH WELLS and ROBERT BOONE possessed 459 blue and yellow tablets containing 13.77 grams of Oxycodone while traveling eastbound on Interstate 80 in Sandusky County, Ohio.

101. On or about September 7, 2018, at approximately 10:32 a.m., FELICIA MCPHERSON called NOEL MOTT on the telephone. During the call, MCPHERSON stated, "Hey." MOTT stated, "I got bad news." MCPHERSON stated, "What's the matter?" MOTT stated, "They just called SETH [WELLS] this morning and said they found 'em [Oxycodone pills]." MCPHERSON stated, "[inaudible]." MOTT stated, "Mm, I'm about to let him tell you what they said, hold on." MCPHERSON stated, "You ain't got to tell me, you just come. You

still comin'? MOTT stated, "Yeah, yeah, I'm leavin' now. I'm leavin' now. Yeah."

MCPHERSON stated, "I mean it is what it is. I'll just have to, uh." MOTT stated, "S**t, do we know how many of them it was, how many they say it was? 450 [450 Oxycodone pills]."

MCPHERSON stated, "Oh lord." MOTT stated, "Hold on one second, hold on."

102. On or about September 7, 2018, at approximately 11:54 a.m., IVAN TROUP called NOEL MOTT on the telephone. During the call, MOTT stated, "I just took a 20,000 loss [\$20,000] bro." TROUP stated, "What happened?" MOTT stated, "Man, I don't even want to talk about it on the phone." TROUP stated, "[inaudible]." MOTT stated, "But um, yeah I wouldn't even know way around." TROUP stated, "Man, cuz." MOTT stated, "SETH [WELLS] got pulled over, and they did an impound. I went and picked them up or whatever, they ain't go to jail or nothin' but they searched the car during the impound. Found my little hook up [459 Oxycodone pills]." TROUP stated, "Damn . . . Damn. Uh, s**t what we got to do?" MOTT stated, "S**t, ain't nothin' I can do but keep going [selling drugs]. S**t. You feel me? The conversation continued and TROUP stated, "Eastwood has something." MOTT stated, "I called him this morning but he didn't answer. But um, I'm getting ready to head that way now. I'm leaving right now heading that way."

103. On or about September 11, 2018, at approximately 2:47 p.m., FELICIA MCPHERSON sent a text message to NOEL MOTT, which stated, "U left 115 [115 Oxycodone pills] x23 I got 420 [420 Oxycodone pills] x23 from Ivo [IVAN TROUP]."

104. On or about September 11, 2018, at approximately 3:28 p.m., MYKEL SMITH called NOEL MOTT on the telephone. During the call, MOTT stated, "Waiting on you." SMITH stated, "Oh, we going out of town [Detroit, Michigan]? MOTT stated, "Yeah. SMITH stated, "Okay, I'm about to go change my clothes real quick and I be there. On my way. You say."

105. On or about September 11, 2018, at approximately 8:41 p.m., MYKEL SMITH called NOEL MOTT on the telephone. During the call, MOTT stated, "Hello." SMITH stated, "What up." MOTT stated, "What up doe?" SMITH stated, "I just dropped your dad off and took his suitcase and everything up to house, up in the room for him. I'm pulling out now heading to big girl [FELICIA MCPHERSON] house. Uh, BA [TERRENCE SUDBERRY] text me or something, uh, what's the word. What is going on with that?" MOTT stated, "Yeah, I guess he gone ride back with you." SMITH stated, "Alright, where does he live?" MOTT stated, "On Trimble." SMITH stated, "Oh, it's not that far away then?" MOTT stated, "Oh no, no, you got to get his address and GPS it, I forgot he stays with girls." SMITH stated, "Alright." MOTT stated, "Yep."

106. On or about September 11, 2018, at approximately 8:55 p.m., FELICIA MCPHERSON called NOEL MOTT on the telephone. During the call, MOTT stated, "Hello." MCPHERSON stated, "Hello." MOTT stated, "Yeah, what up doe?" MCPHERSON stated, "Ah is there anything special I'm supposed to be doing besides sending this stuff [Oxycodone pills]?" MOTT stated, "Um, I kinda waiting on IVAN [IVAN TROUP]." MCPHERSON stated, "Alright." MOTT stated, "I got two people got some." MCPHERSON stated, "Oh, and he still busy, I had just called him. So you want him to just, want me to just count what I got? And just tell him we waiting on IVO [IVAN TROUP]?" MOTT stated, "Yeah." MCPHERSON stated, "Can I um, can I send sixty." MOTT stated, "Yup." MCPHERSON stated, "Alright." MOTT stated, "Alright." MCPHERSON stated, "So, he said, he said count what I got, and then he waiting on IVO cause he got two more people. Do you want him to go get, what you want him to do first? Hold on." MOTT stated, "Hey, really I guess I can just double back and, hello?" MCPHERSON stated, "What you say?" MOTT stated, "I was just about to say, I guess I can get with um, the other. I can get what you got and just get the rest tomorrow because GUNNER

[MYKEL SMITH] do got to go to work in the morning.” SMITH stated, “Yeah, this is me.”

MOTT stated, “Oh, okay well let her know that.” SMITH stated, “Okay, okay. I’ll go pick up . . .” MOTT stated, “Alright.” SMITH stated, “Alright.”

107. On or about September 11, 2018, DESHAWN DOWDELL possessed two digital scales; a drug press; a .357 caliber Taurus Tracker handgun, serial number FU652509; one .45 caliber/410 gauge Taurus the Judge handgun, serial number 10995335; 462.72 grams of heroin; 631.5 grams of fentanyl; 3.78 grams of marijuana; and \$3,386 in U.S. currency.

108. On or about September 12, 2018, at approximately 10:17 a.m., M.B. [an individual known the Grand Jury, but not charged herein] called NOEL MOTT on the telephone. During the call, M.B. stated, “My bad, I ain’t hear my phone ringing, it was on vibrate.” MOTT stated, “What you doin’?” M.B. stated, “Nothin’, just pulled up Porsha’s house so she can this phone out of here so she can switch BOB’s [DESHAWN DOWDELL] number over.” MOTT stated, “Oh, she talk to him?” M.B. stated, “Yeah, she talked to him at like two in the morning, well she’s on the phone with Vern right now. Vern just got off the phone with him.” MOTT stated, “[inaudible].” M.B. stated, “They said they been watchin’ him since four in the morning yesterday.” MOTT stated, “Bob [DOWDELL]?” M.B. stated, “Mm, hmm.” MOTT stated, “So it ain’t got nothin’ to do with the murder case?” M.B. stated, “Oh they got it on there, they put on um, everybody’s on Facebook. They said the screenshots and s**t on there, you know, whole Turtle’s family, or whatever prayin’ . . . talkin’ ‘bout him. S**t, they put on there ‘murder’.” MOTT stated, “Who the police did?” M.B. stated, “Mm, hmm.” MOTT stated, “Oh they turned it to a murder?” M.B. stated, “Yup, and I guess he just told Vern that he was going to court, so I guess there just waiting on him to call back.” MOTT stated, “Oh, he did talk to Vern?” M.B. stated, “Mm, hmm, just a minute ago . . . right now. MOTT stated, “Hmm.” M.B. stated, “He said he tried to get out the f***in’ attic.” MOTT stated, “Who, who BOB [DOWDELL] did?

M.B. stated, "Mm, hmm." MOTT stated, "Who was in there with him?" M.B. stated, "Just him, I think. They tore that place up." MOTT stated, "Ya'll went in there?" M.B. stated, "No but Vern said he tried to go in there and get the keys, he said that s**t is tore up." MOTT stated, "To get the keys to the car or somethin?" M.B. stated, "Mm, hmm. MOTT stated, "Oh, BOB [DOWDELL] told me someone broke in there. M.B. stated, "When?" MOTT stated, "The day before this s**t happened. This what, I'm talkin' about the day before the day before the s**t, he like, bro, as far as we talkin' . . . I was like, I need some blazay . . . he was like, 'did April sell you somethin'?' I was like, 'who the f**k, I don't know no damn April.' He like, 'n***a you know my auntie be with um, Mark.' I was like 'man I ain't him or them motherfuc****s.' And I was like 'why you say that', he was like 'man someone broke in my house and stole 200 grams [200 grams of fentanyl]'. And I was just telling him I just lost 27,000 [\$27,000] on the road. He was like n***a I just lost 200 grams [200 grams of fentanyl]. I was like, 'what happened.' He was like, 'somebody broke in the house . . . that's why you ask me that?' And I held up what I got to show it to him at the showroom and s**t and um . . . somebody broke in the house but he was like, he don't know how they got in. I'm like bro, you sure it wasn't the police, and then this s**t happens the next day." M.B. stated, "Damn, they said they was trackin' his phone and everything. Well that's what Vern's saying. I don't know if that's true." MOTT stated, "It is probably true because um, um, Peggy's sister bro. They picked her up and questioned her about me, BLACK [RAYSHAUN WALKER], and BOONE [ROBERT BOONE]. M.B. stated, "Rickell?" MOTT stated, "Yeah." M.B. stated, "Yeah, Porsha just told me that Rickell is snitchin'. And then yesterday with Porsha fought Peggy and Jessica was like the police is lookin' for you and BLACK [WALKER]. But I feel like BLACK might have something to do with it. Because he ain't, I just asked Porsha, and Porsha said he ain't been around in like a month." MOTT stated, "Who? My BLACK [RAYSHAUN WALKER]?" M.B. stated, "No, uh."

MOTT stated, "No, I ain't talkin' 'bout that Black. I'm talkin', 'bout my BLACK [WALKER]." M.B. stated, "Oh." MOTT stated, "I'm talkin', you know who I'm talkin' bout?" M.B. stated, "Yeah, RAYSHAUN [WALKER]." MOTT stated, "Yeah, RAYSHAUN [WALKER]. They was showin' Rickell pictures of me, RAYSHAUN [WALKER]. Police supposed to be lookin' for me too." M.B. stated, "They know where you be at. How the f**k are they lookin' for ya'll. That's what I don't understand about them. They know where every single one of ya'll be at."

109. On or about September 12, 2018, at approximately 4:12 p.m., ASHLIE SMITH called NOEL MOTT on the telephone. During the call, SMITH stated, "Hey." MOTT stated, "What up?" SMITH stated, "Um, I'm leavin', uh, the pharmacy. Can I come, uh, see you and trade [trading prescription drugs for heroin]?" MOTT stated, "I'm over on Adams." SMITH stated, "Alright, I'll see you in a second."

110. On or about September 12, 2018, at approximately 6:45 p.m., NOEL MOTT sent a text message to MIRANDA HAMILTON, which stated, "A do u want to drive up the way."

111. On or about September 12, 2018, at approximately 6:46 p.m., MIRANDA HAMILTON sent a text message to NOEL MOTT, which stated, "Yeah I can when u talkin'."

112. On or about September 12, 2018, at approximately 6:47 p.m., NOEL MOTT sent a text message to MIRANDA HAMILTON, which stated, "Half hour u can take Tony with you."

113. On or about September 12, 2018, at approximately 6:47 p.m., MIRANDA HAMILTON sent a text message to NOEL MOTT, which stated, "Okay sounds good."

114. On or about September 12, 2018, at approximately 7:25 p.m., MIRANDA HAMILTON called NOEL MOTT on the telephone. During the call, MOTT stated, "[inaudible] to pick you up." HAMILTON stated, "Who is?" MOTT stated, "MEG [MEGAN MORITZ]." HAMILTON stated, "To pick me up?" MOTT stated, "Yeah, she got my car." HAMILTON stated, "So what? Is she comin' with me?" MOTT stated, "Yeah, she gonna drive down [to

Detroit] and you drive back [to Mansfield]." HAMILTON stated, "Oh, are you serious? Alright." MOTT stated, "Alright."

115. On or about September 12, 2018, at approximately 7:38 p.m., MIRANDA HAMILTON called NOEL MOTT on the telephone. During the call, HAMILTON stated, "Hey, my car seat for him is still in the van right?" MOTT stated, "Damn, damn, it's right, yeah, yeah, she went to gas up. When she pull up, I'll put it back in there." HAMILTON stated, "Oh, you had taken it out?" MOTT stated, "Yeah, 'cause we went to Lowe's." HAMILTON stated, "Okay." MOTT stated, "We been workin' on this house all day." HAMILTON stated, "Yeah, don't forget the car seat. So how long till she's here? Like ten, fifteen minutes?" MOTT stated, "Probably, yeah, yeah, I gave her, she got your money too." HAMILTON stated, "Alright." MOTT stated, "Alright." HAMILTON stated, "Alright."

116. On or about September 12, 2018, at approximately 8:04 p.m., FELICIA MCPHERSON called NOEL MOTT on the telephone. During the call, MCPHERSON stated, "Hey." MOTT stated, "What up doe?" MCPHERSON asked, "Hey did they [MEGAN MORITZ and MIRANDA HAMILTON] leave already? MOTT stated, "Yeah." MCPHERSON stated, "Okay, uh, nothin' cuz. I just now got then I just now got uh, official number. What you send for?" MOTT stated, "I gave there the money for what you said plus um, do you remember." MCPHERSON stated, "I can't remember exactly what I said." MOTT stated, "I think I gave her another, didn't you say you found another 86 [86 Oxycodone pills] or something?" MCPHERSON stated, "Yeah." MOTT stated, "That's what I gave the money for." MCPHERSON stated, "But I can't remember the first number." MOTT stated, "It's in my phone. Hold on let me look it up." MCPHERSON stated, "Basically, basically I got, basically it's a total of 321 [321 Oxycodone pills] and whatever that total is times \$23 then you got to take your \$1,500 off so I just . . . " MOTT stated, "I did that, I did all that already" MCPHERSON stated,

“Awe, okay, naw, cuz I just . . .” MOTT stated, “Hold on I’m about to go to my calculator and tell ya. Hold on.” MCPHERSON stated, “Alright. I can tell you what I need and you can tell me if you sent it. I need \$5,883.” MOTT stated, “I am about to tell you what I did um. It was . . . and fourty-five, take away \$1,500, that was \$2,985 and 153 [153 Oxycodone pills] times 23 that’s \$3,105 plus, um, let me see. That’s what I sent you. The first money was \$3,105 and I just put another uh \$1,980 there.” MCPHERSON stated, “What you say thirty, thirty one, oh, five you said.” MOTT stated, “And I put another \$1,980 with it.” MCPHERSON stated, “Plus \$1,980.” Okay, um, somebody will wait.” MOTT stated, “Alright.” MCPHERSON stated, “Somebody just called and . . . so I added it in.” MOTT stated, “Don’t worry about it.” MCPHERSON stated, “Alright, bye, huh.” MOTT stated, “[inaudible].” MCPHERSON stated, “Alright, bye.”

117. On or about September 12, 2018, at approximately 8:25 p.m., NOEL MOTT sent a text message to MIRANDA HAMILTON, which stated, “She [MEGAN MORITZ] get u yet.”

118. On September 12, 2018, at approximately 8:28 p.m., MEGAN MORITZ sent a text message to NOEL MOTT which stated, “We out.”

119. On or about September 13, 2018, at approximately 1:26 a.m., FELICIA MCPHERSON sent a text message to NOEL MOTT, which stated, “We done. 150 [150 15mg Oxycodone pills] teen-160b [160 30mg Oxycodone pills] from me And I have 46x23 in change.. 130 [130 Oxycodone pills] from ole boy.”

120. On or about September 13, 2018, at approximately 12:38 p.m., NOEL MOTT called IVAN TROUP on the telephone. During the call, TROUP stated, “What up cuz?” MOTT stated, “What up cuz?” TROUP stated, “Oh no, I called you to uh . . . see if you.” MOTT stated, “I didn’t get no call from you.” TROUP stated, “Oh, I uh, just called you a minute ago must not have gone through.” MOTT stated, “Nope.” TROUP stated, “I called you before I got in the

shower. I was callin' to see uh, two things. One, if you looked at the uh, s**t [heroin] I sent you." MOTT stated, "Yeah, I just looked at it, I just gave somebody [heroin tester] some. I ain't heard [if it's good] back yet." TROUP stated, "Okay, I was about to say, the next thing, was uh, did you get that shit straight with FELICIA [FELICIA MCPHERSON] yesterday 'cause she called me sayin' some money was short." During the conversation, TROUP stated, "Yup, hey look, at the end of the day I hope that other s**t [heroin] work out 'cause you gon' say f**k them other." MOTT stated, "He gonna say f**k the other ones?" TROUP stated, "Naw, naw, I'm sayin' I'm talkin' 'bout I hope that s**t [heroin] I gave you work out so we can say f**k . . . and switch it up." MOTT stated, "Right, right." TROUP stated, "Get rich for real." Later in the conversation, MOTT stated, "Um, yeah I got, I gave it to him naked [raw heroin], so I'm waiting to hear back from him." TROUP stated, "Mm, hmm." MOTT stated, "I can tell it been touched [cut] already though, but that don't mean nothin'." TROUP stated, "He said they ain't do [cut] nothing to it. He said it was straight hard cash." MOTT stated, "Naw, he got it, whoever he got it from, touched it like I know the smell." TROUP stated, "Oh, okay." MOTT stated, "But just like I say, some s**t, a motherfuc**r get it might take a 15 [15 grams of heroin] and they put a 5 [5 grams of cut] on it, give it to the next person. You feel me? Everybody always when they do it motherfuc**n' greedy . . . leave room for the next person to make some money. That shit's . . . high as hell after that."

121. On or about September 14, 2018, at approximately 1:17 p.m., JASON REID called NOEL MOTT on the telephone. During the call, MOTT stated, "What up doe? Who this?" REID stated, "Uh, this BULL [JASON REID]." MOTT stated, "What up doe?" REID stated, "Uh, I'm with somebody, right? And uh, they askin' about you. They said that more or less they used to buy they subs [Suboxone strips] and they wanna know if you still, if you still do that?" MOTT stated, "What they got, strips?" REID stated, "You got strips?" An Unknown

Female stated, “[inaudible]” MOTT stated, “Yeah, I’ll take ‘em.” REID stated, “Pills, pills.” MOTT stated, “Oh, the pills?” REID stated, “Yeah, pills.” MOTT stated, “Damn, I got a bunch of them pills already. Really.” REID stated, “[inaudible].” MOTT stated, “Huh?” REID stated, “That’s, what you lettin’ ‘em go for?” MOTT stated, “I got a bunch of them already. I’m kinda loaded though with them already.” REID stated, “Oh, he say he loaded with them already. If you had the strips he’d take ‘em.” The Unknown Female stated, “[inaudible].” REID stated, “I guess, but uh.” The Unknown Female stated, “[inaudible].” REID stated, “She said she’d try to get you some strips.” MOTT stated, “Alright.” REID stated, “Uh man, I to, I’m about to walk, I’m about to walk down and I’ll talk to you face to face. So you probably can understand who she is. Her name’s Shannon. She said she used to f**k with some chick named what?” Unknown Female stated, “. . .” REID stated, “Kaylin. Alright.” Unknown Female stated, “Allred.” REID stated, “Allred.” MOTT stated, “I’m down, I’m down here on the porch bruh.” REID stated, “Alright.” MOTT stated, “Alright.”

122. On or about September 15, 2018, at approximately 9:07 a.m., ASHLIE SMITH called NOEL MOTT on the telephone. During the call, SMITH stated, “Hey.” MOTT stated, “Hey.” SMITH stated, “Can I go on Adams and grab that [heroin]?” MOTT stated, “Yeah, BA [SADBERRY] there.” SMITH stated, “Who?” MOTT stated, “BA.” SMITH stated, “Oh, never mind, alright, alright.” MOTT stated, “Alright.”

123. On or about September 16, 2018, at approximately 12:58 a.m., NOEL MOTT sent a text message to ASHLIE SMITH, which stated, “What I’m bringing.”

124. On or about September 16, 2018, at approximately 12:58 a.m., ASHLIE SMITH sent a text message to NOEL MOTT, which stated, “Grey half [half gram of heroin]”.

125. On or about September 16, 2018, at approximately, 2:39 p.m., TERRENCE SADBERRY called NOEL MOTT on the telephone. During the call, SADBERRY asked, “You

down the street?" MOTT stated, "Who this?" SADBERRY stated, "This is BA." MOTT stated, "Oh I'm 'bout to pull up I'm comin' down Park Ave., I need the key." SADBERRY stated, "You got the food [heroin]?" MOTT stated, "I got the what?" SADBERRY stated, "You got the food [heroin]?" MOTT stated, "Yeah, I, the food [heroin] is down the street at that house, who is this BA [TERRENCE SADBERRY]?" SADBERRY stated, "Yeah, I was just makin', yeah that what I am askin' ya." MOTT stated, "You know, you know I ain't got the food [heroin] I ain't even at the house." SADBERRY stated, "I didn't, I didn't, I was just callin' and see if you was down there before I walked down that's all, alright." MOTT stated, "Yeah, I still need ya to come down so I can get in." SADBERRY stated, "Okay, here I come." MOTT stated, "Alright."

126. On or about September 17, 2018, at approximately 2:13 p.m., TERRENCE SADBERRY sent a text message to NOEL MOTT which stated, "S [marijuana] gone."

127. On or about September 17, 2018, at approximately 2:24 p.m., NOEL MOTT sent a text message to TERRENCE SADBERRY which stated, "Ok I got some more."

128. On or about September 20, 2018, at approximately, 10:15 a.m., B.F. [an individual known the Grand Jury, but not charged herein] called NOEL MOTT on the telephone. During the call, B.F. stated, "Hey, they good up at the garage?" MOTT stated, "You say what?" B.F. stated, "Are they good [still selling drugs] up at the garage?" MOTT stated, "No we, we, chillin' [done selling drugs] for the day." B.F. stated, "Oh, okay I was gonna get . . ." MOTT stated, "They [police] raiding all around here. They raided on Lind [** Lind Avenue, Mansfield, Ohio] too. KRIS [KRISTOPHER HERRON] probably in jail." B.F. stated, "Oh s**t." MOTT stated, "Yeah." B.F. stated, "You said you are down for the day?" MOTT stated, "Yeah." B.F. stated, "Okay." MOTT stated, "Alright." B.F. stated, "Bye."

129. On or about September 20, 2018, at approximately 12:07 p.m., MYKEL SMITH called NOEL MOTT on the telephone. During the call, MOTT stated, "What up doe?" SMITH

stated, "Any puppy food [heroin] around?" MOTT stated, "Uh, uh, not right now." SMITH stated, "F**k! They got raided on yesterday. This morning." MOTT stated, "Everybody got raided this mornin'." SMITH stated, "Nuh, uh." MOTT stated, "Uh, hmm." SMITH stated, "Anybody you know?" MOTT stated, "Hell, yeah. They hit my crib too." SMITH stated, "No they didn't." MOTT stated, "Yeah." SMITH stated, "Which one?" MOTT stated, "All of 'em." SMITH stated, "Where you at?" MOTT stated, "They, I'm over on um, you know I got, where my daddy at." SMITH stated, "Alright bro, I'll call you." MOTT stated, "Alright."

130. On or about September 20, 2018, MARCUS CALDWELL possessed drug paraphernalia; one 9mm SCCY, CPX-2 handgun, serial number 428321; one 9mm Ruger, 9E handgun, with an obliterated serial number; thirteen .380 caliber live rounds; one 7.62 caliber live round; one .223 caliber live round; one 12 gauge shotgun shell; fourteen 12 gauge Winchester Shotgun shells; 28.72 grams of marijuana; 637 blue and yellow tablets containing 19.11 grams of Oxycodone; 40 Xanax tablets weighing 8.09 grams, and \$2,837 in U.S. currency at *** South Adams Street, Mansfield, Ohio.

131. On or about September 20, 2018, JASON REID possessed drug paraphernalia; one box of .40 caliber ammunition; one Ruger handgun magazine containing 9mm ammunition; one Glock magazine containing 9mm ammunition; 2.63 grams of marijuana; and \$175 in U.S. currency.

132. On or about September 20, 2018, NOEL MOTT, ROBERT BOONE, and ASHLIE SMITH possessed one 7.62 caliber Romak 99 rifle, serial number 1-03337-99; one .40 caliber EAA Witness P handgun, serial number EA81454; one .40 caliber Ruger SR40C handgun, serial number 343-68024; one 9mm Glock 17 handgun, with an obliterated serial number; one .45 caliber Colt 1911 handgun, serial number 2822941; one 9mm Cobra M-11 handgun, serial number 89-0057411; one 9mm Intratec Tec9 handgun, serial number 52221; one 7.62 caliber

Century Arms RAS47 rifle, serial number RAS47P001995; one .40 caliber Glock 23 handgun, serial number PUC333; 10.88 grams of marijuana; three orange tablets weighing 1.20 grams of Suboxone; and .81 grams of fentanyl at ** Brickman Avenue, Mansfield, Ohio.

133. On or about September 20, 2018, NOEL MOTT and TERRENCE SUDBERRY possessed three digital scales; 7.49 grams of marijuana; 6.86 grams of heroin; 17.76 grams of fentanyl; 69 off white tablets, weighing 6.97 grams, identified as Adderall; one white tablet, weighing .41 grams, identified as Buprenorphine; 7 orange tablets, weighing 2.8 grams, identified as Buprenorphine and Naxolone; 422 blue tablets containing 12.66 grams of Oxycodone; one .380 Ruger LCP handgun, serial number 371762856; one .45 Masterpiece Arms MPA Short handgun, serial number A6943; one .223 caliber Anderson AM-15 pistol, serial number 17094728; and \$2,688 in U.S. Currency at *** South Adams Street, Mansfield, Ohio

134. On or about November 2, 2018, at approximately 4:17 p.m., KRISTOPHER HERRON sent a text message to NOEL MOTT which stated, "Dude still got teens [15mg oxycodone pills] over there boss."

135. On or about November 2, 2018, at approximately 4:18 p.m., KRISTOPHER HERRON sent a text message to NOEL MOTT, which stated, "Was there 2 hours ago but s**t changes."

136. On or about November 2, 2018, at approximately 4:27 p.m., NOEL MOTT sent a text message to KRISTOPHER HERRON, which stated, "He out of them."

137. On or about November 2, 2018, at approximately 4:28 p.m., KRISTOPHER HERRON sent a text message to NOEL MOTT, which stated, "Shit any thing."

138. On or about November 2, 2018, at approximately 4:28 p.m., KRISTOPHER HERRON sent a text message to NOEL MOTT, which stated, "No bigg [30 mg Oxycodone pills]."

139. On or about November 2, 2018, at approximately 4:32 p.m., NOEL MOTT sent a text message to KRISTOPHER HERRON, which stated, "Bigs [30 mg Oxycodone pills] yes."

140. On or about November 2, 2018, at approximately 4:33 p.m., KRISTOPHER HERRON sent a text message to NOEL MOTT, which stated, "Cool."

141. On or about November 3, 2018, at approximately 10:59 a.m., KRISTOPHER HERRON sent a text message to NOEL MOTT, which stated, "I at the spot need 2 biggs [two 30mg Oxycodone pills] but can I slide 3 bucks."

142. On or about November 22, 2018, KRISTOPHER HERRON possessed drug paraphernalia; 84 blue tablets containing 2.52 grams of Oxycodone; 47 yellow tablets of Alprazolam [Xanax]; 2.49 grams of cocaine; and \$2,185 in U.S. Currency at **** Montgomery Road, Ashland, Ohio.

143. On or about December 18, 2018, MEGAN MORITZ possessed .09 grams of marijuana and 260 blue and white pills containing 7.8 grams of Oxycodone while traveling eastbound on Interstate 80 in Sandusky County, Ohio.

All in violation of Title 21, United States Code, Section 846.

COUNT 2

(Distribution of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

144. On or about June 6, 2018, in the Northern District of Ohio, Eastern Division, Defendant KRISTOPHER HERRON did knowingly and intentionally distribute approximately .5 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 3

(Distribution of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

145. On or about June 7, 2018, in the Northern District of Ohio, Eastern Division, Defendant KRISTOPHER HERRON did knowingly and intentionally distribute approximately .38 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 4

(Distribution of Oxycodone, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

146. On or about August 24, 2018, in the Northern District of Ohio, Eastern Division, Defendant WILLIAM NORRIS did knowingly and intentionally distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 5

(Distribution of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

147. On or about August 27, 2018, in the Northern District of Ohio, Eastern Division, Defendant MARKELL BOYD did knowingly and intentionally distribute approximately .09 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 6

(Distribution of Heroin, in violation of 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

148. On or about August 28, 2018, in the Northern District of Ohio, Eastern Division, Defendant MARKELL BOYD did knowingly and intentionally distribute approximately .05 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 7

(Possession with Intent Distribute Oxycodone, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

149. On or about September 7, 2018, in the Northern District of Ohio, Eastern Division, Defendants SETH WELLS and ROBERT BOONE did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 8

(Possession with Intent to Distribute Heroin, 21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

The Grand Jury further charges:

150. On or about September 11, 2018, in the Northern District of Ohio, Eastern Division, Defendant DESHAWN DOWDELL did knowingly and intentionally possess with intent to distribute 462.72 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT 9

(Possession with Intent to Distribute of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(A))

The Grand Jury further charges:

151. On or about September 11, 2018, in the Northern District of Ohio, Eastern Division, Defendant DESHAWN DOWDELL did knowingly and intentionally possess with intent to distribute 631.5 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT 10

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(C)(1)(A))

The Grand Jury further charges:

152. On or about September 11, 2018, in the Northern District of Ohio, Eastern Division, Defendant DESHAWN DOWDELL did knowingly possess a firearm in furtherance of a drug trafficking crime, for which said defendant may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A), and (b)(1)(C), as charged in Count 1, and/or Possession with Intent to Distribute Heroin and/or Fentanyl, in violation of Title 21, United States Code, Sections 841(a)(1) (b)(1)(A) and (b)(1)(B), as charged in Count 8 and 9 of the Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 11

(Possession with Intent to Distribute of Oxycodone, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

153. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant MARCUS CALDWELL did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 12

(Felon in Possession of a Firearm, 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

154. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant MARCUS CALDWELL, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is: Trafficking in Drugs, a felony in the 4th degree, Case Number 2001CR0553, Richland County Common Pleas Court, on or about January 11, 2002; Domestic Violence, a felony in the 4th degree, Case Number 2008CR0390, Richland County Common Pleas Court, on or about February 22, 2011; and Trafficking in Cocaine, a felony in the 4th degree, Case Number 20160331, Richland County Common Pleas Court, on or about March 1, 2017, did knowingly possess in and affecting interstate commerce firearms and ammunition, to wit: a 9mm SCCY, CPX-2 handgun, serial number 428321; a 9mm Ruger, 9E handgun, with an obliterated serial number; and ammunition; said firearms and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 13

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(C)(1)(A))

The Grand Jury further charges:

155. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant MARCUS CALDWELL did knowingly possess a firearm in furtherance of a drug trafficking crime, for which said defendant may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and (b)(1)(C), as charged in Count 1, and/or Possession with Intent to Distribute Oxycodone in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), as charged in Count 11 of the Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 14

(Felon in Possession of a Firearm, 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

156. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant NOEL MOTT, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is: Distribution of Cocaine Base ("Crack"), a felony, Case Number 1:06CR165, U.S. District Court, Northern District of Ohio, Eastern Division, on or about August 29, 2006, did knowingly possess in and affecting interstate commerce firearms and ammunition, to wit: a 7.62 caliber, Romak 99 rifle, serial number 1-03337-99; a .40 caliber EAA Witness P handgun, serial number EA81454; a .40 caliber Ruger, SR40C handgun, serial number 343-68024; a 9mm, Glock 17 handgun, with an obliterated serial number; a .45 caliber, Colt 1911 handgun, serial number 2822941; a 9mm, Cobra M-11 handgun, serial number 89-0057411; a 9mm, Intratec Tec9 handgun, serial number 52221; a 7.62 caliber,

Century Arms, RAS47 rifle, serial number RAS47P001995; a .40 caliber, Glock 23 handgun, serial number PUC333; and ammunition; said firearms and ammunition having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 15

(Possession with Intent to Distribute of Oxycodone, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2)

The Grand Jury further charges:

157. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant NOEL MOTT and TERRENCE SADBERRY did knowingly and intentionally possess with the intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, Section 2, United States Code.

COUNT 16

(Possession with Intent to Distribute of Fentanyl, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2)

The Grand Jury further charges:

158. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendants NOEL MOTT and TERRENCE SADBERRY did knowingly and intentionally possess with intent to distribute 17.76 grams of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 17

(Possession with Intent to Distribute of Heroin, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 18 U.S.C. § 2)

The Grand Jury further charges:

159. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendants NOEL MOTT and TERRENCE SUDBERRY did knowingly and intentionally possess with intent to distribute 6.86 grams of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 18

(Felon in Possession of a Firearm, in violation of 18 U.S.C. § 922(g)(1))

The Grand Jury further charges:

160. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant NOEL MOTT, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, that is: Distribution of Cocaine Base ("Crack"), a felony, Case Number 1:06CR165, U.S. District Court, Northern District of Ohio, Eastern Division, on or about August 29, 2006, did knowingly possess in and affecting interstate commerce firearms and ammunition, to wit: a .380 Ruger LCP handgun, serial number 371762856; a .45 Masterpiece Arms MPA Short handgun, serial number A6943; a .223 caliber, Anderson AM-15 pistol, serial number 17094728; and ammunition; said firearms and ammunition, having been shipped and transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 19

(Possession of a Firearm in Furtherance of a Drug Trafficking Crime, 18 U.S.C. § 924(C)(1)(A))

The Grand Jury further charges:

161. On or about September 20, 2018, in the Northern District of Ohio, Eastern Division, Defendant NOEL MOTT did knowingly possess firearms in furtherance of a drug trafficking crime, for which said defendant may be prosecuted in a court of the United States, that is, Conspiracy to Possess with Intent to Distribute and to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and (b)(1)(C), as charged in Count 1, and/or Possession with Intent to Distribute Controlled Substances, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C), as charged in Counts 15, 16, and 17 of the Indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A), and punishable under Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 20

(Possession with Intent to Distribute of Oxycodone, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

162. On or about November 22, 2018, in the Northern District of Ohio, Eastern Division, Defendant KRISTOPHER HERRON did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 21

(Possession with Intent to Distribute of Oxycodone, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

163. On or about December 18, 2018, in the Northern District of Ohio, Eastern Division, Defendant MEGAN MORITZ did knowingly and intentionally possess with intent to

distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNTS 22-42

(Use of a Communication Facility in Furtherance of a Drug Trafficking Crime, 21 U.S.C. § 843(b))

The Grand Jury further charges:

164. On or about the dates and approximate times listed below, in the Northern District of Ohio, Eastern Division, and elsewhere, the defendants listed below did knowingly and intentionally use a communication facility, to wit: a telephone, to facilitate acts constituting a felony under Title 21, United States Code, Section 846:

Count	Defendants	Date	Time
22	DENNIS CARTER R.K.	April 27, 2018	12:30 p.m.
23	NOEL MOTT RAYSHAUN WALKER	July 31, 2018	9:29 p.m.
24	NOEL MOTT CYNTHIA HUFFMAN	August 1, 2018	1:24 a.m.
25	NOEL MOTT DONALD ADAMS	August 1, 2018	8:26 p.m.
26	NOEL MOTT WILLIAM NORRIS	August 2, 2018	9:44 p.m.
27	NOEL MOTT MEGAN MORITZ	August 7, 2018	2:28 p.m.
28	NOEL MOTT TERRENCE SADBERRY	August 10, 2018	10:35 p.m.
29	NOEL MOTT TARYN OHL	August 11, 2018	3:49 p.m.
30	NOEL MOTT IVAN TROUP	August 12, 2018	9:46 p.m.
31	NOEL MOTT JASON REID	August 13, 2018	9:47 a.m.
32	NOEL MOTT MARCUS CALDWELL	August 15, 2018	9:59 a.m.

33	NOEL MOTT TESSA CHRISTY	August 24, 2018	7:31 p.m.
34	NOEL MOTT MIRANDA HAMILTON	August 17, 2018	5:30 p.m
35	NOEL MOTT SETH WELLS	August 31, 2018	10:10 a.m.
36	NOEL MOTT MARKELL BOYD	August 16, 2018	5:32 p.m
37	NOEL MOTT ROBERT BOONE	September 5, 2018	8:44 p.m
38	NOEL MOTT DEVON TROUP	August 20, 2018,	10:07 p.m
39	NOEL MOTT ASHLIE SMITH	August 9, 2018	12:34 p.m
40	NOEL MOTT MYKEL SMITH	September 11, 2018	8:04 p.m
41	NOEL MOTT FELICIA MCPHERSON	September 12, 2018	8:41 p.m
42	NOEL MOTT KRISTOPHER HERRON	November 2, 2018	4:14 p.m.

All in violation of Title 21, United States Code, Section 843(b).

FORFEITURE

The Grand Jury further charges:

For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) the allegations of Count 1 through 42, inclusive, are incorporated herein by reference.

As a result of the foregoing offenses, Defendants NOEL MOTT, aka M; DONALD ADAMS, aka DON; FELICIA MCPHERSON; IVAN TROUP, aka IVO; DEVON TROUP; DESHAWN DOWDELL, aka BOB; MARKELL BOYD; DENNIS CARTER; MARCUS CALDWELL, aka DB, aka BIG MARCUS; TERRENCE SUDBERRY, aka B.A.; ROBERT BOONE; KRISTOPHER HERRON; JASON REID, aka BULL; WILLIAM NORRIS; RAYSHAUN

WALKER, aka RAY, aka BLACK; CYNTHIA HUFFMAN, aka MOLLY; TESSA CHRISTY, aka TESS; SETH WELLS; MIRANDA HAMILTON; ASHLIE SMITH; MEGAN MORITZ; TARYN OHL; MYKEL SMITH, aka GUNNER shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of such violations; any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations; and, any and all property [including firearms and ammunition] involved in or used in the commission of such violations; including, but not limited to, the following:

a. The following firearms, with miscellaneous ammunition, seized from MARCUS CALWELL:

1. 9mm SCCY, CPX-2 handgun, serial number 428321; and
2. 9mm Ruger, 9E handgun, with an obliterated serial number;

b. The following firearms, with miscellaneous ammunition, seized from NOEL MOTT:

1. 7.62 caliber, Romak 99 rifle, serial number 1-03337-99;
2. .40 caliber EAA Witness P handgun, serial number EA81454;
3. .40 caliber Ruger, SR40C handgun, serial number 343-68024;
4. 9mm Glock 17 handgun, with an obliterated serial number;
5. .45 caliber, Colt 1911 handgun, serial number 2822941;
6. 9mm, Cobra M-11 handgun, serial number 89-0057411;
7. 9mm, Intratec Tec9 handgun, serial number 52221;
8. 7.62 caliber, Century Arms, RAS47 rifle, serial number RAS47P001995;
9. .40 caliber, Glock 23 handgun, serial number PUC333;
10. .380 Ruger LCP handgun, serial number 371762856;
11. .45 Masterpiece Arms MPA Short handgun, serial number A6943; and
12. .223 caliber, Anderson AM-15 pistol, serial number 17094728.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.